

REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY

All Cases: Debtor(s) Elizabeth Colon

Case No. 15-09380

Chapter 13

All Cases: Moving Creditor Neighborhood Lending Services, Inc

Date Case Filed 03/17/2015

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____

Or Date Plan Confirmed July 27, 2015

Chapter 7: ☐ No-Asset Report Filed on _____
☐ No-Asset Report not Filed. Date of Creditors Meeting _____

1. Collateral
 - a. ☒ Home
 - b. ☐ Car Year, Make, and Model _____
 - c. ☐ Other (describe) _____
2. Balance Owed as of January 14, 2019 \$92,840.45
Total of all other Liens against Collateral \$14,765.00
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post—petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$162,000.00
5. Default
 - a. ☐ Pre-Petition Default
Number of months _____ Amount \$ _____
 - b. ☒ Post-Petition Default
 - i. ☒ On direct payments to the moving creditor
Number of months 4 Amount \$3,642.66
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____
6. Other Allegations
 - a. ☒ Lack of Adequate Protection § 362 (d)(1)
 - i. ☐ No insurance
 - ii. ☐ Taxes unpaid Amount \$ _____
 - iii. ☒ Rapidly depreciating asset
 - iv. ☐ Other (describe) _____
 - b. ☒ No Equity and not Necessary for an Effective Reorganization § 362 (d)(2)
 - c. ☐ Other “Cause” § 362 (d)(1)
 - i. ☐ Bad Faith (describe) _____
 - ii. ☐ Multiple Filings
 - iii. ☐ Other (describe) _____
 - d. Debtor's Statement of Intention regarding the Collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☐ Surrender
 - iv. ☐ No Statement of Intention Filed

Date: January 15, 2020

/s/Michael Dimand
Michael Dimand
Counsel for Movant